

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FT. WORTH DIVISION**

**ROBERT “BOB” ROSS AND
EUGENIO VARGAS
Plaintiff/Counterclaim Defendant**

V.

**ASSOCIATION OF
PROFESSIONAL FLIGHT
ATTENDANTS, MCGAUGHEY,
REBER AND ASSOCIATES, INC.,
JULIE HEDRICK, ERIK HARRIS**

Defendants/Counterclaim Plaintiff.

Case No. 4:22-CV-00343-Y

**Consolidated with
Case No. 4-22-CV-00430-Y**

Judge: Terry R. Means

DECLARATION OF KERRI PHILIPS ATTORNEY'S FEES

STATE OF TEXAS §

COUNTY OF DENTON §

Pursuant to 28 U.S.C. § 1746, I, Kerri Phillips, declare:

1. "I am over 18 years of age and reside in the State of Texas. I have never been convicted of any felony or other crime involving moral turpitude. I am fully competent to make this affidavit.
2. I have personal knowledge of the facts set forth in this affidavit and the facts are true and correct.
3. I am the owner and founding attorney of KD Phillips Law Firm, PLLC (the "Firm"), in which as many as three associates have been under my direction and located at 6010 West Spring Creek Parkway, Plano, Texas 75024.
4. The Firm represents Plaintiff Robert Ross in this action.

Plaintiff Robert Ross has agreed to pay the Firm for professional services and costs at an agreed-upon hourly rates on a contingency basis.

5. Also, I represent Plaintiff, Eugenio Vargas related action has very recently consolidated with the Ross action. Likewise, Eugenio Vargas has agreed to pay the Firm for professional services and costs at an agreed-upon hourly rates on a contingency basis.

Experience

I performed the work described in this affidavit.

6. I graduated from the SMU Dedman School of Law in 2008 and have been licensed to practice in Texas since November 2008. I am a member in good standing with the State Bar of Texas. I have dedicated my career to debt law and debtor's and creditor's rights cases involving contract and guaranty claims. I have worked in the corporate, public and private sector, representing both lenders and borrowers. My genre is bankruptcy, creditor-debtor and finance matters. Currently, I am the owner and founding attorney and my standard rate for 2022 - present is \$350 per hour.

Case Records

As an attorney practicing in the commercial litigation and financial services and as owner, I am the custodians of records for the Firm's litigation matters. The Firm keeps the records I identify in this affidavit in the regular course of business. A person with knowledge of the act, event, condition, or opinion made these records at or near the time, or reasonably soon after, the act, event, or condition occurred, or opinion was made. The records I identify in this affidavit— except for any limited redactions to protect confidential information—are the originals or exact duplicates of the originals.

Robert Ross Sued the Association of Professional Flight Attendants, McGaughey, Reber and Associates, Julie Hedrick and Erik Harris to Vacate an Arbitration Award and for Breach of Federal and Texas Common Law Fiduciary Duty regarding a Disciplinary Action

On April 22, 2022, Robert Ross filed his Original Complaint in the United State District Court for the Northern District of Texas, Fort Worth Division, against the Association of Profession Flight Attendants, McGaughey, Reber and Associates, Inc., Julie Hedrick, and Erik Harris for breach of contract, to vacate a disciplinary action which has caused him reputational harm and has violated his violated his civil rights. Mr. Ross was initially sued by the flight attendants for the alleged debt owed, and his account was placed in collections.

Eugenio Vargas Sued the Association of Professional Flight Attendants,

Julie Hedrick and Erik Harris to Vacate an Arbitration Award and for Breach of Federal and Texas Common Law Fiduciary Duty regarding a Disciplinary Action

On May 17, 2022, Eugenio Vargas filed his Original Complaint in the United State District Court for the Northern District of Texas, Fort Worth Division, against the Association of Profession Flight Attendants, Julie Hedrick, and Erik Harris to vacate a disciplinary action, also.

Hours Worked & Fees Incurred

The Firm has worked to date hours on this matter 1,624.75. That work includes, among others: (a) review and analysis of the termination agreement, union constitution, collective bargaining and labor law essentials along with Labor Management Reporting and Disclosure Act familiarity; (b) corresponding with personnel regarding the basis and status of the claim and status of pre-litigation and litigation endeavors; (d) writing, filing, and serving the original complaint; (e) obtaining service on Defendants; (f) document reviews, compilation and analysis during the discovery process, (g) research and investigation of witnesses, writing, revising, and filing the motions, including motions for summary judgment, pleadings and discovery requests and responses; and (i) including frequent communications with each client and others associated with the developments of this suit.

The work can be segregated by reference to the ABA's litigation codes: A101 (planning and prepare[consultation]); A102 (research); A103 (draft/revise); A104 (review/analyze); A105 (communicate (in firm)); A106; (communicate (with client)); A107 (communicate (other outside counsel)); A108 (communicate (external)); A111 (budgeting) L110 (fact investigation/development); L120 (analysis & strategy); L140 (document/management); L150 (other); L190 (other case assessment, development and administration); L210 (pleadings); L230 (court mandated conference; L240 (dispositive motions); L250 (other written motions and submissions); L320 (document production); L330 (depositions); L390 (other discovery); L410 (fact witnesses); L440 (other trial/[hearing] preparation and support; L450 (trial and hearing attendance).

The below chart reflects the hours I describe above, multiplied by the rates the Firm charges for each professional. The chart reflects both billed and unbilled time. The unbilled time is “work in progress” mostly related to the motion for summary judgment and is yet to be invoiced.

1. The below chart reflects the hours I describe above, multiplied by the rates the Firm charges for each professional. The chart reflects both

billed and unbilled time. The unbilled time is “work in progress” mostly related to the motion for summary judgment and is yet to be invoiced.

ABA LITIGATION CODES	KDP
A101	3.50
A102	182.00
A103	131.25
A104	104.50
A105	16.00
A106	115.75
A107	15.75
A108	48.00
A110	28.75
A111	6.25
L110	222.25
L120	95.25
L140	56.75
L150	32.50
L190	13.50
L210	77.50
L230	7.00
L240	66.75
L250	32.00
L320	223.50
L330	21.75
L390	47.50
L410	64.50
L440	9.75
L450	2.50
TOTAL	1,624.75

The Hours Worked Are Reasonable

2. The hours the Firm worked on this matter are reasonable. I performed most of the work related to the pleadings and the motion for summary judgment. The work on the motion for summary judgment took a reasonable amount of time and represents a sensible use of resources.

3. The work related to this declaration is also reasonable, as it included a review of billing entries which are contingency based. Mr. Ross carries a certain percentage of the hourly charges and Mr. Vargas carries the remainder. One report is generated, and both parties receive the billing diary together.

4. The work performed on the motions for summary judgment is reasonable and necessary to dispose of this case because I have an obligation to pursue this case diligently and because liability and damages are established beyond dispute. It is my professional opinion that the hours the Firm spent creating and finalizing the motion for summary judgment were reasonable and necessary to enforce Mr. Ross's rights in this case.

The Hourly Rates Charged Are Reasonable

5. I am familiar with the amount of legal work necessary in debt claims in the civil litigation sector. Regarding the subject matter of the case, as I explain above, I am a career commercial litigator and I have focused almost exclusively on representing financial institutions, borrowers, and creditors. Regarding customary rates, I began my legal career in the Dallas-Fort Worth Area in 2008. Through my own practice, I am aware of the fees commonly charged in Collin, Denton, Dallas and Tarrant County for the kind of legal services rendered in this case.

6. Based on my experience in the Collin County legal market and, specifically, the market for complex commercial litigation counsel, the rates I charges are equal to or less than of the peer attorneys who have similar education, work background, and experience, and who perform similar work for clients in similar cases. The fee is a flat rate with no incremental increase from year-to-year as charged by most firms.

The Total Fee Amount Is Reasonable

7. The amount of work necessary to pursue the claims in this case was reasonable.

8. The disputes' resolution attempts involved three stages. First, Mr. Ross sought to dialogue with the union to resolve the issues but without avail. Shortly after filing the suits, both Mr. Ross and Mr. Vargas offered three settlement options

including a mutual walk away and the union rejected all three offers in Spring 2023. During Fall 2023, Mr. Ross and Mr. Vargas attempted again to cooperate with the Defendants and agree to mediation yet without avail. Unfortunately, on multiple occasions, both gentlemen sought amicable resolutions to their matters and had expected Defendants to work with them. When those efforts failed, they filed motions for summary judgment. In doing so, it was critical that I present thorough, professional, and persuasive motions to the court to avoid further expenses.

9. For the reason described above, it is my opinion that: (a) the time the Firm spent in handling this case and preparing the motions for summary judgment was reasonable and necessary; (b) the Firm's rates are reasonable and necessary; and (c) the total fees billable of \$568,662.50 for the amount of work necessary to pursue the claims in this case was reasonable.

Expenses Incurred

10. The case incurred filing and service of process cost. \$6,493.65 in expenses related to this matter: \$545.00 for the investigator/process server to serve three citations I conduct due diligence in an attempt to locate the parties. \$402.00 for filing each original complaint; and \$7.00 for research with the Texas Secretary of State to confirm details about Defendants. Deposition costs were \$3,231.55. PACER cost incurred has totaled \$2,308.10 It is my opinion that these expenses are reasonable and necessary.

11. The total amount of reasonable fees plus expenses for this matter is \$575,156.15.

Hearing & Appellate Fees

12. It is also my opinion that an additional \$5,000 will be necessary if there is a hearing on this matter and for any further prosecution of this motion, \$7,000 will be necessary if motions to vacate are filed, and an additional \$20,000 will be necessary if appeals are filed. I base these opinions on my experience in handling motions for summary judgment.

13. after the Firm's professional fee invoices related to these matters are attached hereto and incorporated as **Exhibit A**.

14. After considering the record in this case, the amount in controversy, and the other factors listed and examined above, it is my opinion that **Mr. Ross incurred legal fees and expenses in the amount of \$502,362.50 and Mr. Vargas incurred \$72,495.56. Thus, the combine total of legal fees and expenses in the amount of \$574,858.06 are reasonable and**

necessary attorneys' fees, court costs, and expenses for the prosecution of this matter through the date of the filing of Robert Ross and Eugenio Vargas's motions for summary judgment against all Defendants.

I declare under penalty of perjury that the foregoing is true and correct.

FURTHER AFFIANT SAYETH NOT.

EXECUTED on this the 26th day of April 2024.

A handwritten signature in cursive script that reads "Kerri Phillips". The signature is written in dark ink and is positioned above a horizontal line.

Kerri Phillips

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

EXHIBIT A

ROBERT “BOB” ROSS AND EUGENIO VARGAS

Plaintiffs/Counterclaim Defendants,

V.

**ASSOCIATION OF PROFESSIONAL
FLIGHT ATTENDANTS, *et al.*,**

Defendants/Counterclaim Plaintiffs.

Civil Action No. 4:22-cv-343-Y

**Consolidated with
Civil Action No. 4:22-cv-430-Y**

Judge Terry R. Means

INDEX TO EXHIBITS IN SUPPORT OF DECLARATION FOR ATTORNEY'S FEES AND COSTS

<u>Tab</u>	<u>Description</u>	<u>Appx Pgs.</u>
	SUPPORTING DOCUMENTS	
1	Exhibit 1 – KD Phillips Law Firm Invoice#’s 001-0027 in the amount of \$568,662.50 from January 2022 to current for legal services for Bob Ross and Eugenio Vargas	807-861
2	Exhibit 2 - 10.12.2022 Invoice# 7790736 in the amount of \$150.00 from Sparre Process Servers re Service of Process of Armendariz subpoena duces tecum	862-863
3	Exhibit 3 - 10.12.2022 Invoice# 7790756 in the amount of \$135.00 from Sparre Process Servers re Service of Process of Woods Stephens O’Neil subpoena duces tecum	864-865
4	Exhibit 4 - 10.12.2022 Invoice# 7790772 in the amount of \$135.00 from Sparre Process Servers re Service of Process of Cornwell Jackson subpoena duces tecum	866-867
5	Exhibit 5 - 08.23.2023 Invoice# 9450477 in the amount of \$125.00 from Service of Process re American Airline FCU subpoena duces tecum	868-869
6	Exhibit 6 - 02.08.2024 Invoice# 9586A in the amount of \$1,083.90 from Stryker Court Reporting re 02.01.2024 Ross Deposition Transcript	870-871
7	Exhibit 7 - 02.08.2024 Invoice# 9588A in the amount of \$362.90 from Stryker Court Reporting re 02.02.2024 Vargas Deposition Transcript	872-873
8	Exhibit 8 - 03.05.2024 Invoice3 41537 in the amount of \$505.00 from Elite Video Productions re 02.01.2024 Ross Deposition Video with redacted receipt	874-876
9	Exhibit 9 - 03.21.2024 Invoice# 9744A in the amount of \$313.00 Stryker Court Reporting re 03.08.2024 Vargas Deposition Transcript	877-878

EXHIBIT A

10	Exhibit 10 - 03.21.2024 Invoice# 9763A in the amount of \$341.75 Stryker Court Reporting re 03.15.2024 Ross Deposition Transcript	879-880
11	Exhibit 11 - 03.28.2024 Invoice# 41592 in the amount of \$625.00 from Elite Video Production re 03-08-2024; and 03-15-2024 Ross and Vargas Deposition Videos	881-883
12	Exhibit 12 - 07.07.2022 Invoice# 4914009-Q22022 in the amount of \$189.50 from Pacer re Ross and Vargas	884-885
13	Exhibit 13 - 10.05.2022 Invoice# 4914009-Q32022 in the amount of \$363.80 from Pacer re Ross and Vargas	886-887
14	Exhibit 14 - 01.04.2023 Invoice# 4914009-Q42022 in the amount of \$288.40 from Pacer re Ross and Vargas	888-889
15	Exhibit 15 - 04.04.2023 Invoice# 4914009-Q12023 in the amount of \$68.80 from Pacer re Ross and Vargas	890-891
16	Exhibit 16 - 07.05.2023 Invoice# 4914009-Q22023 in the amount of \$247.50 from Pacer re Ross and Vargas	892-893
17	Exhibit 17 - 10.04.2023 Invoice# 4914009-Q32023 in the amount of \$397.40 from Pacer re Ross and Vargas	894-895
18	Exhibit 18 - 01.04.2024 Invoice# 4914009-Q42023 in the amount of \$364.20 from Pacer re Ross and Vargas	896-897
19	Exhibit 19 - 04.04.2024 Invoice# 4914009-Q12024 in the amount of \$388.50 from Pacer re Ross and Vargas	898-899

Respectfully submitted,
K.D. PHILLIPS LAW FIRM, PLLC

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Email: kerri@KDphillipslaw.com

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For Service of Filings:
notice@KDphillipslaw.com

ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

APPENDIX 805

I certify that the true and correct copy of this document was sent to all counsel of record, hereunder listed via ECF Filing **on this the 26th day of April 2024.**

/s/ Kerri Phillips

Kerri Phillips, Esq.

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Tab 1

**Invoice**

5700 Tennyson Parkway, Suite 300
Plano, Texas 75024

Bill To:
Robert Ross
Sent via email: 1rross@comcast.net

Invoice Date:	02/01/22
Invoice No.	001
Billing Period:	01/01/22 to 01/31/22

For Legal Services Rendered

16.75 hrs@\$350.00 per hr

Date	Activity	Hours
1/28/2022	Consult.	3.50
1/28/2022	Corresp	1.25
1/29/202	Comm w client	2.00
1/31/2022	Comm w client	2.75
1/31/2022	Review docs	4.50
1/31/2022	Rsch	2.75

Total Billable Hours:	16.75
Total Professional Services:	\$350.00
Total Expenses:	\$0.00
Total Invoice Amount:	\$5,862.50
Previous Balance:	\$0.00
Balance (Amount Due):	\$5,862.50

Terms & Conditions

Please remit payment upon receipt
After 45 days, additional charges may apply.

**Invoice**

5700 Tennyson Parkway, Suite 300
Plano, Texas 75024

Bill To:
Robert Ross
Sent via email: 1ross@comcast.net

Invoice Date:	03/01/22
Invoice No.	002
Billing Period:	02/01/22 to 02/28/22

For Legal Services Rendered

24.50 hrs@\$350.00 per hr

Date	Activity	Hours
2/1/2022	File review, corresp	2.25
2/1/2022	Teleconf.	1.75
2/1/2022	Rsch	4.75
12/15/2020	Review pleadings, corresp	0.50
2/9/2022	Rsch, draft	3.75
2/12/2022	Comm w client	2.00
2/16/2022	Prepare for hearing, corresp.	2.25
2/23/2022	Comm w client	1.00
2/24/2022	Rsch	3.75
2/28/2022	Teleconf.	1.50
2/28/2022	Attend hearing	1.00

Total Billable Hours:	24.50
Total Professional Services:	\$350.00
Total Expenses:	\$0.00
Total Invoice Amount:	\$8,575.00
Previous Balance:	\$0.00
Balance (Amount Due):	\$8,575.00

Terms & Conditions

Please remit payment upon receipt
After 45 days, additional charges may apply.

**Invoice**

5700 Tennyson Parkway, Suite 300
Plano, Texas 75024

Bill To:
Robert Ross
Sent via email: 1ross@comcast.net

Invoice Date:	04/01/22
Invoice No.	003
Billing Period:	03/01/22 to 03/31/22

For Legal Services Rendered

46.50 hrs@\$350.00 per hr.

Date	Activity	Hours
3/1/2022	Status Meeting	2.25
3/5/2022	Comm w client	2.75
3/7/2022	Review pleadings	4.00
3/7/2022	Corresp	0.25
3/8/2022	Teleconf.	2.75
3/8/2022	Review docs	3.75
3/8/2022	Rsch, draft complaint	4.75
3/11/2022	Rsch	2.75
3/11/2022	Draft complaint, corresp.	2.25
3/15/2022	Assess strategy	4.75
3/16/2022	Teleconf.	1.00
3/23/2022	Review docs	5.25
3/23/2022	Edit complaint	2.25
3/23/2022	Comm w client	2.25
3/30/2022	Review docs	2.50
3/31/2022	Review draft complaint	2.00
3/31/2022	Comm w client	1.00

Total Billable Hours:	46.50
Total Professional Services:	\$350.00
Total Expenses:	\$0.00
Total Invoice Amount:	\$16,275.00
Previous Balance:	\$0.00
Balance (Amount Due):	\$16,275.00

Terms & Conditions

Please remit payment upon receipt
After 45 days, additional charges may apply.

**Invoice**

5700 Tennyson Parkway, Suite 300
Plano, Texas 75024

Bill To:
Robert Ross
Sent via email: 1ross@comcast.net

Invoice Date:	05/01/22
Invoice No.	004
Billing Period:	04/01/22 to 04/30/22

For Legal Services Rendered

48.00 hrs@\$350.00 per hr.

Date	Activity	Hours
4/1/2022	Status Meeting	1.75
4/2/2022	Comm w client	1.50
4/6/2022	Review pleadings	0.50
4/6/2022	Corresp	0.75
4/13/2022	Comm w client	2.75
4/13/2022	Review docs	6.75
4/14/2022	Rsch, draft complaint	6.25
4/14/2022	Rsch	4.75
4/15/2022	Status Meeting	1.00
4/18/2022	Draft complaint, corresp.	2.75
4/18/2022	Comm w client	1.00
4/18/2022	Rsch	5.50
4/19/2022	Compile exhibits/appendix	4.25
4/19/2022	Teleconf.	1.25
4/19/2022	Edit complaint	3.25
4/19/2022	Comm w client	0.50
4/20/2022	File complaint	2.00
4/21/2022	Instructions to process server	0.50
4/22/2022	Teleconf.	0.75
4/25/2023	Teleconf w process server	0.25

Total Billable Hours:	48.00
Total Professional Services:	\$350.00
Total Expenses:	\$0.00
Total Invoice Amount:	\$16,800.00
Previous Balance:	\$0.00
Balance (Amount Due):	\$16,800.00

Terms & Conditions

Please remit payment upon receipt

After 45 days, additional charges may apply.

**Invoice**

5700 Tennyson Parkway, Suite 300
Plano, Texas 75024

Bill To:
Robert Ross and Eugenio Vargas
Sent via email: 1ross@comcast.net and medellin3@hotmail.com

Invoice Date:	06/01/22
Invoice No.	005
Billing Period:	05/01/22 to 05/31/22

For Legal Services Rendered

41.25 hrs@\$350.00 per hr.

Date	Activity	Hours
5/2/2022	Status Meeting	1.75
5/2/2022	Comm w client	2.00
5/3/2022	Rsch	3.75
5/6/2022	Corresp	0.75
5/11/2022	Comm w client	2.75
5/16/2022	Status Meeting	1.50
5/16/2022	Review draft and finalize Complaint	4.50
5/17/2022	File Complaint	0.50
5/18/2022	Review docs	5.75
5/18/2022	Draft pro hac vice app	0.75
5/21/2022	Comm w client	2.50
5/23/2022	Rsch	5.75
5/24/2022	Instructions to process server	0.50
5/23/2022	Teleconf.	0.50
5/25/2023	Teleconf w process server	0.25
5/27/2022	Comm w client	1.50
5/31/2022	Review pleadings	5.25
5/31/2022	Corresp	1.00

Total Billable Hours:	41.25
Total Professional Services:	\$350.00
Total Expenses:	\$0.00
Total Invoice Amount:	\$14,437.50
Previous Balance:	\$0.00
Balance (Amount Due):	\$14,437.50

Terms & Conditions

Please remit payment upon receipt
After 45 days, additional charges may apply.

**Invoice**

5700 Tennyson Parkway, Suite 300
Plano, Texas 75024

Bill To:
Robert Ross and Eugenio Vargas
Sent via email: 1ross@comcast.net and medellin3@hotmail.com

Invoice Date:	07/01/22
Invoice No.	006
Billing Period:	06/01/22 to 06/30/22

For Legal Services Rendered

34.25 hrs@\$350.00 per hr.

Date	Activity	Hours
6/1/2022	Status Meeting	1.75
6/2/2022	Comm w client	1.75
6/4/2022	Rsch	4.75
6/5/2023	Draft pleading, corresp.	4.00
6/4/2022	Review pleadings	0.50
6/6/2023	File pleading	2.00
6/6/2022	Corresp	0.25
6/14/2022	Comm w client	0.75
6/15/2022	Review docs	2.75
6/16/2022	Status Meeting	1.00
6/17/2022	Rsch	4.75
6/20/2022	Draft pleading, corresp.	2.75
6/22/2022	Teleconf.	1.00
6/24/2022	Comm w client	2.25
6/28/2022	Teleconf.	0.50
6/29/2023	Review pleadings	1.50
6/29/2022	Corresp	0.50
6/30/2022	Teleconf.	1.50

Total Billable Hours:	34.25
Total Professional Services:	\$350.00
Total Expenses:	\$0.00
Total Invoice Amount:	\$11,987.50
Previous Balance:	\$0.00
Balance (Amount Due):	\$11,987.50

Terms & Conditions

Please remit payment upon receipt
After 45 days, additional charges may apply.

**Invoice**

5700 Tennyson Parkway, Suite 300
Plano, Texas 75024

Bill To:
Robert Ross and Eugenio Vargas
Sent via email: 1ross@comcast.net and medellin3@hotmail.com

Invoice Date:	08/01/22
Invoice No.	007
Billing Period:	07/01/22 to 07/31/22

For Legal Services Rendered

31.50 hrs@\$350.00 per hr.

Date	Activity	Hours
7/1/2022	Status Meeting	1.00
7/2/2022	Comm w client	1.75
7/12/2022	Review docs	4.50
7/13/2022	Rsch	5.50
7/15/2022	Status Meeting	0.75
7/16/2022	Assess strategy	5.25
7/18/2022	Corresp.	0.50
7/18/2022	Comm w client	1.75
7/18/2022	Teleconf.	1.25
7/21/2022	Review pleadings	2.25
7/21/2022	Teleconf.	1.75
7/21/2022	Mtg & Conf prep	0.75
7/21/2022	Mtg re 26(f) - Meet & Conf	1.00
7/22/2022	Review pleadings	0.75
7/23/2022	Comm w client	2.00
7/29/2022	Draft disclosures	0.75

Total Billable Hours:	31.50
Total Professional Services:	\$350.00
Total Expenses:	\$0.00
Total Invoice Amount:	\$11,025.00
Previous Balance:	\$0.00
Balance (Amount Due):	\$11,025.00

Terms & Conditions

Please remit payment upon receipt
After 45 days, additional charges may apply.

**Invoice**

5700 Tennyson Parkway, Suite 300
Plano, Texas 75024

Bill To:
Robert Ross and Eugenio Vargas
Sent via email: 1ross@comcast.net and medellin3@hotmail.com

Invoice Date:	09/01/22
Invoice No.	008
Billing Period:	08/01/22 to 08/31/22

For Legal Services Rendered

32.00 hrs @\$350.00 per hr.

Date	Activity	Hours
8/3/2022	Status Meeting	0.75
8/6/2022	Corresp	0.25
8/13/2022	Comm w client	1.75
8/13/2022	Review docs	3.75
8/14/2022	Rsch, compile docs	5.25
8/14/2022	Review pleadings	2.75
8/16/2022	Form witness kits	0.50
8/17/2022	Rsch	2.00
8/17/2022	Status Meeting	0.75
8/18/2022	Draft pleading, corresp.	2.75
8/18/2022	Teleconf.	1.00
8/19/2022	Rsch witnesses	4.25
8/19/2022	Teleconf.	1.25
8/19/2022	Edit motion	2.25
8/19/2022	Teleconf.	0.50
8/23/2022	File motion	2.00
8/24/2022	Comm w client	1.00
8/27/2022	Comm w client	1.75

Total Billable Hours:	32.00
Total Professional Services:	\$350.00
Total Expenses:	\$0.00
Total Invoice Amount:	\$11,200.00
Previous Balance:	\$0.00
Balance (Amount Due):	\$11,200.00

Terms & Conditions

Please remit payment upon receipt
After 45 days, additional charges may apply.